

From: [John Drzal](#)
To: Scoping_Delta_Plan@Delta_Council
Subject: Scoping/General Comments Chico Jan. 26
Date: Thursday, January 27, 2011 12:21:55 PM

1/27/2011

Ms. Terry Macaulay
Delta Stewardship Council

Re: Comments on scoping session on Draft EIR for Delta Plan (scoping session held in Chico Jan. 26, 2011) and general comments regarding DSC activities.

Dear Ms. Macaulay,

I wish to make the following comments regarding scope and content of draft EIR for the Delta Plan:

- 1) The EIR must provide an analysis in great detail of the potential adverse economic, socio-economic and environmental impacts that may flow from any groundwater substitution schemes that may be included in the Plan in the present and/or the future.
- 2) Any hydrological modeling used to support a finding of no significant impact must be described and analyzed in painstaking detail in the EIR as to the scope, scientific origin and reliability of such modeling.
- 3) The EIR must address the potential inducing effects of the Plan on the likely, long-term expansion of water marketing in California, including an analysis of the apparent attempted conversion of a right to use water for beneficial purposes to an ownership right.
- 4) There must be a socio-economic analysis of the Council's newly created and expansive regulatory and enforcement reach from the Delta to the Oregon border.
- 5) There needs to be an explanation and justification for the claim the Central and Northern Sacramento Valley is a watershed for the Delta. It is a watershed for the Sacramento River, which is a tributary to the Delta.

I wish to make the following comments regarding the DSC's activities.

I attended the scoping session in Chico Jan. 26 and left the meeting deeply troubled by the Council's rush to complete an EIR and Plan in one year. I don't buy the "Schwarzenegger is making us do it" justification I heard at the meeting. The fact that the Council held one meeting in the Sacramento Valley two days before the close of the

comment period for scoping the EIR is troubling, evidence that the Council is going too fast, and evidence that the Council is getting off on the wrong foot with the citizens. A Plan of this magnitude and it's 50 to 90 year time frame, with the potential to do great harm to the lifeblood of the Northern third of the state, can not be rushed through despite the desire of South State interests, through the Legislature, to complete a plan for the 2012 water bond campaign.

I believe, and suggest, the Council needs to go to the Legislature, and say, "We need more time."

Sincerely,

John Drzal
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Chico, CA